

September 22, 2008

Lauren Lien
Chris Jones
Reports Analysis Division
Federal Election Commission
999 E. Street, NW
Washington, DC 20463

Re: Hillary Clinton for President; FEC ID No. C00431569, July Monthly Report (6/1/08-6/30/08)

Dear Ms. Lien and Mr. Jones,

This is in response to your letter requesting additional information pertaining to the above-listed report of Hillary Clinton for President (the Committee). Where necessary Amendments will be filed to correct or clarify or make any needed changes.

You have requested information regarding the Offset from National Fuel and Gas Distribution Corp, USSS and Wilmer Cutler Pickering Hale and Dorr LLP. The refund from National Fuel and Gas Distribution Corp was for a payment the Committee made 3/25/08 for \$431.95(the Payee was just National Fuel with the community branch address in Erie PA). The reimbursement from the United States Secret Service is for their share of travel cost the Committee paid. The offset by Wilmer Cutler Pickering Hale and Dorr LLP was an inadvertent error and was deposited by mistake. It has been returned and was reported on the Committees September Monthly.

You have also requested additional information on a few donor refunds. Anderson, A was reported on our March Mthly and May Mthly. She contributed \$2300 Primary on 2/29/08 and another \$4600 on 4/4/2008. Brown, S of Golden CO contributed 3/6/2008 contributed \$2300 to the Primary and \$2300 to the General, the refund made to Brown S of Philomath OR was done in error and voided. Metz, S contributed several times his 4/23/2008 contribution was made via the website and he accidently contributed more then he intended. Unaware this was in error the Committee refunded him his excessive contribution at the same time Mr. Metz cancelled his credit card transaction. The Committee will amend to correct his aggregation. Richard Machado Gonzalez contributed 4/18/2008 and 6/30/2007 and was reported as each check listed him Richard Machado and Richard Machado Gonzalez after the Committee verified that it was the same individual he was refunded the Committer will Amend to correct the Aggregation. The political committee Strickland for Governor contributed 2/22/2008..

You have asked for additional information on several debts. As the Commission notes in the report instructions debts under \$500 and less the 60 days do not need to be reported. Once the Committees debt to the vendor exceeds these limits the Committee then includes them as a debt owed. All of the debts noted by the Commission are under the reporting threshold except for Holtz and Reed LLP and Schwartz, M. These two debts were put on in error and should not have been reported as debt. The Committee will amend to remove them from the June Monthly debt.

You have also noted that, in some cases, the purposes for the Committee s debts to individuals for travel reimbursements on Schedule D is different from the purposes made for payments to those same individuals on Schedule B. There are two explanations for this. First, the expenditures actually made on Schedule B are, in fact, for different purposes, i.e., different obligations, than the amounts unpaid and owed on Schedule D. However, because it is the same individual who was paid and to whom the debt is owed, the payment is disclosed on Schedule D as a payment this period, even if it was for other purposes. In other words, the Committee may owe a staff member travel reimbursements, which are unpaid and a debt, while at the same time, paying that same person a salary, which is not part of the debt.

Therefore, the purpose of the debt is different than the purpose of the expenditure. The Committees reporting software automatically aggregates these payments for the this period field on Schedule D. However, the Committee is of the understanding that the Commission is requesting that only payments made to reduce the debt portion be included as payments this period and that other payments to the same creditor be excluded. (RAD referred the Committee to the instructions for Schedule D-P, even though the instructions do not indicate that only payments made to reduce debts be included in the this period field.) Although the Committee believes that this is a change from past Commission requirements, it will seek to have its reporting software changed, so that the information may be separated. However, the Committee is not yet aware whether this change to the reporting software may be able to be effectuated.

The second reason that some of the purposes on Schedule D are different than the expenditure purposes on Schedule B is because the Committee more fully itemizes the purposes for multiple invoices on Schedule B. Whereas the purpose on Schedule D may indicate travel, the full itemization of the multiple expenditures on Schedule B may indicate travel, per diem, meal expense, and office supplies. This is due to the reporting software that the Committee uses for the debt purposes, which does not easily permit disclosure of multiple purposes on the Schedule D. The Committee will seek a correction to its reporting software and will endeavor to amend to clarify additional purposes on the Schedule D.

With respect to the final item noted by you, when reimbursements to staff for travel have exceeded \$500, the Committee has, in fact, itemized on its Schedule B the related payments from staff to vendors when such payments have exceeded \$200 for the election cycle.

I hope this information is sufficient for your review. However, should you desire any additional information, please contact our Counsel, Eric Kleinfeld, at 202-293-1177.

Sincerely,

Shelly Moskwa
Treasurer, Hillary Clinton for President

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